

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENDALL CARNAHAN,

Plaintiff,

v.

BATON CORPORATION LTD, d/b/a
PUMP.FUN, ALON COHEN, DYLAN
KERLER, and NOAH BERNHARD HUGO
TWEEDALE,

Defendants.

Case No. 1:25-cv-00490-CM-BCM

**MEMORANDUM IN FURTHER SUPPORT OF AARON KVENILD'S
MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

On March 18, 2025, movant Aaron Kvenild (“Movant”) filed a Motion for Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel in this action pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. §77z-1(a)(3)(B), stating that he had suffered a financial loss of \$18,602.84 related to his purchase of PNUT Tokens (ECF No. 14). No other lead plaintiff motions were filed.

Pursuant to the PSLRA, district courts are to adopt a presumption that the applicant with the largest financial interest in the relief sought by the class and who satisfies the requirements of Fed. R. Civ. P. 23 is the “most adequate plaintiff,” and are to appoint the most adequate plaintiff to serve as lead plaintiff. *See* 15 U.S.C. § 77z-1(a)(3)(B)(iii).

As movant Aaron Kvenild’s pending motion is unopposed, and his motion makes a *prima facie* showing that he satisfies the adequacy and typicality requires of Rule 23 and his chosen counsel are qualified, Aaron Kvenild respectfully requests that the Court issue an Order pursuant to 15 U.S.C. §77z-1(a)(3)(B): (1) appointing Aaron Kvenild as Lead Plaintiff in the above captioned action; (2) approving Lead Plaintiff’s selection of Wolf Popper LLP and Burwick Law PLLC as Co-Lead Counsel for the Class; and (3) granting such other and further relief as the Court may deem just and proper.

Dated: April 1, 2025
New York, NY

Respectfully submitted,

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*Attorneys for Movant Aaron Kvenild and
Proposed Lead Counsel for the Class*